CERTIFICATION

SDG No:

JC18972T

Laboratory:

Accutest, New Jersey

Site:

BMS, Building 5 Area, PR

Matrix:

Groundwater

Humacao, PR

SUMMARY:

Groundwater samples (Table 1) were collected on the BMSMC facility – Building 5 Area. The BMSMC facility is located in Humacao, PR. Samples were taken April 21, 2016 and were analyzed in Accutest Laboratory of Dayton, New Jersey for low molecular weight alcohols (LMWA):- isopropyl alcohol and sec-butyl alcohol. The results were reported under SDG No.: JC18649T. Results were validated using "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods SW-846 (Final Update III, December 1996)," specifically for Methods 8000/8015C are utilized and the latest validation guidelines (July, 2015) of the EPA Hazardous Waste Support Section. The analyses performed are shown in Table 1. Individual data review worksheets are enclosed for each target analyte group. The data sample organic data samples summary form shows for analytes results that were qualified.

In summary the results are valid and can be used for decision taking purposes.

Table 1. Samples analyzed and analysis performed

SAMPLE ID	SAMPLE DESCRIPTION	MATRIX	ANALYSIS PERFORMED
JC18972-4T	RA16-GWS	Groundwater	LMWA:- ISOPROPYL ALCOHOL AND SEC- BUTYL ALCOHOL

Reviewer Name:

Rafael Infante

Chemist License 1888

Signature:

Date:

June 25, 2016

SGS Accutest

Report of Analysis

Page 1 of 1

Client Sample ID: RA16-GWS Lab Sample ID:

JC18972-4T

Matrix: Method: AQ - Ground Water

SW846-8015C (DAI)

Date Received:

Date Sampled: 04/21/16 04/25/16

Percent Solids:

Q

Project:

BMSMC, Building 5 Area; PR

		n #1 a n #2	File ID GH105444.D	DF 1	Analyzed 06/13/16	By XPL	Prep Date n/a	Prep Batch n/a	Analytical Batch GGH5320
--	--	----------------	-----------------------	---------	----------------------	-----------	------------------	-------------------	-----------------------------

Compound	Result	RL	MDŁ	Units
Isopropyl Alcohol sec-Butyl Alcohol	ND ND	100 100	68 66	ug/l ug/l
Surrogate Recoveries	Run# 1	Run# 2	Lim	its
Hexanol Hexanol	75% 82%			45% 45%
	Isopropyl Alcohol sec-Butyl Alcohol Surrogate Recoveries Hexanol	Isopropyl Alcohol ND sec-Butyl Alcohol ND Surrogate Recoveries Run# 1 Hexanol 75%	Isopropyl Alcohol ND 100 sec-Butyl Alcohol ND 100 Surrogate Recoveries Run# 1 Run# 2 Hexanol 75%	Isopropyl Alcohol

(a) Sample analyzed outside the holding time per client's request.



ND = Not detected

MDL = Method Detection Limit

J = Indicates an estimated value B = Indicates analyte found in associated method blank

RL = Reporting Limit E = Indicates value exceeds calibration range

N = Indicates presumptive evidence of a compound



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JC18972T: Chain of Custody - Page 1 of 5

EXECUTIVE NARRATIVE

SDG No:

JC18972T

Laboratory:

Accutest, New Jersey

Analysis:

SW846-8015C

Number of Samples:

4

Location:

BMSMC, Building 5 Area

Humacao, PR

SUMMARY:

One (1) sample was analyzed for selected low molecular weight alcohols (LMWAs):-isopropyl alcohol and sec-butyl alcohol, following method SW846-8015C. The sample results were assessed according to USEPA data validation guidance documents in the following order of precedence: "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods SW-846 (Final Update III, December 1996)," specifically for Methods 8000/8015C are utilized. The QC criteria and data validation actions listed on the data review worksheets are from the primary guidance document, unless otherwise noted.

Results are valid and can be used for decision making purposes.

Critical issues:

None

Major:

None

Minor:

None

Critical findings:

None

Major findings:

1. Sample analyzed outside the holding time per client's request. Results are qualified in

affected samples: non-detects results are rejected (R).

Minor findings:

None

COMMENTS:

Results are valid and can be used for decision making purposes.

Reviewers Name:

Rafael Infante

Chemist License 1888

Signature:

Date:

June 25, 2016

SAMPLE ORGANIC DATA SAMPLE SUMMARY

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Sample ID: JC18972-4T

Sample location: BMSMC Building 5 Area

Sampling date: 4/21/2016 Matrix: Groundwater

METHOD: 8015C

Analyte Name	Result	Units	Dilution Factor	Lab Flag	Validation	Reportable
Isopropyl Alcohol	100	mg/l	1.0	-	R	Yes
sec-Butyl Alcohol	100	mg/l	1.0	-	R	Yes

	Project Number:JC18972T
	Date:04/21/2016
	Shipping Date:04/21/2016
	EPA Region: 2
REVIEW OF VOLATILE OF The following guidelines for evaluating volatile organics were document will assist the reviewer in using professional judgment the needs of the data users. The sample results were as documents in the following order of precedence: "Test Methods SW-846 (Final Update III, December 1996)," specification and data validation actions listed on the data review works otherwise noted. The hardcopied (laboratory name) _Accutest_ the quality control and performance data summarized. The modulation is a specific to the project/SDG No.:JC18972T	DRGANIC PACKAGE re created to delineate required validation actions. This ent to make more informed decision and in better serving seessed according to USEPA data validation guidance lethods for Evaluating Solid Waste, Physical/Chemical ally for Methods 8000/8015C are utilized. The QC criteria heets are from the primary guidance document, unless data package received has been reviewed and diffed data review for VOCs included:
No. of Samples:1111	
Trip blank No.: Field blank No.: Equipment blank No.: Field duplicate No.:X Data CompletenessX Holding TimesN/A_ GC/MS TuningN/A_ Internal Standard PerformanceX Blanks	
X Surrogate Recoveries	X Quantitation Limits
X Matrix Spike/Matrix Spike Duplicate	
, , , ,	hols:_isopropyl_alcohol_and_sec-butyl_alcohol_by_
Definition of Qualifiers:	
J- Estimated results	
U- Compound not detected	
R- Rejected data	
UJ- Estimated nondetect	
Reviewer: 1 april 1	
Date:June_25,_2016	

DATA COMPLETENESS

MISSING INFORMATION	DATE LAB. CONTACTED	DATE RECEIVED
323 100		

All criteria were met _X_	_
Criteria were not met	
and/or see below	

HOLDING TIMES

The objective of this parameter is to ascertain the validity of the results based on the holding time of the sample from time of collection to the time of analysis.

Complete table for all samples and note the analysis and/or preservation not within criteria

SAMPLE ID	DATE SAMPLED	DATE ANALYZED	pН	ACTION
JC18972-4T	04/21/16	06/13/16	-	Non-detects are rejected
				(R) in affected sample.
All samples analyz	zed within the recomi	mended method holding	time exc	ept in the cases described
in this document.	Sample temperatur	e at receiving was 16.	2°C, ove	er the guidance document
criteria. Results for	r the sample were rej	ected (R).		

<u>Criteria</u>

Aqueous samples – 14 days from sample collection for preserved samples (pH \leq 2, 4°C), no air bubbles. Aqueous samples – 7 days from sample collection for unpreserved samples, 4°C, no air bubbles.

Soil samples- 7 days from sample collection.

Cooler temperature (Criteria: 4 ± 2 °C): 16.2°C

Actions

If the VOCs vial(s) have air bubbles, estimate positive results (J) and reject nondetects (R).

If the % solids of soil samples is 10-50%, estimates positive results (J) and nondetects (UJ)

If the % solid of soil samples is < 10%, estimate positive results (J) and reject nondetects (R).

If holding times are exceeded but < 14 days beyond criteria, estimate positive results (J) and nondetects (UJ). If holding times are exceeded but < 28 days beyond criteria, estimate positive results (J) and reject nondetects (R).

If holding times are grossly exceeded (> 28 days beyond criteria), reject all results (R).

If samples were not iced or if the ice were melted (> 10°C), estimate positive results (J) and nondetects (UJ).

All criteria were metN/A Criteria were not met see below						
instrumentation is within the standard						
vithin the specified criteria.						
sis.						
data should be accepted, qualified or						

GC/MS TUNING The assessment of the tuning results is to determine if the sample tuning QC limits __N/A_ The BFB performance results were reviewed and found to be w __N/A_ BFB tuning was performed for every 12 hours of sample analys If no, use professional judgment to determine whether the associated rejected. List the samples affected: If mass calibration is in error, all associated data are rejected.

All criteria were met _	Х_	
Criteria were not met		
and/or see below		

CALIBRATION VERIFICATION

Compliance requirements for satisfactory instrument calibration are established to ensure that the instrument is capable of producing and maintaining acceptable quantitative data.

Date of initial calibration:_	05/17/16					
Dates of continuing calibra	ition:_05/17/16 (initial);_06/13/16					
Dates of final calibration verification:06/13/16						
Instrument ID number:	GCGH					
Matrix/Level:	Aqueous/low					

DATE	LAB FILE ID#	CRITERIA OUT RFs, %RSD, %D, r	COMPOUND	SAMPLES AFFECTED
				1

Note: Initial and continuing verifications meets method specific criteria. Ending calibration verification included in data package. No action taken, professional judgment.

Criteria

All RFs must be > 0.05 regardless of method requirements for SPCC.

All %RSD must be < 15 % regardless of method requirements for CCC.

All %Ds must be \leq 20% regardless of method requirements for CCC.

It should be noted that Region 2 SOP HW-24 does not specify criterion for the curve correlation coefficient (r). A limit for r of > 0.995 has therefore been utilized as professional judgment.

Actions

If any compound has an initial RF or a continuing RF of < 0.05, estimate positive results (J) and reject nondetects (R), regardless of method requirements.

If any compound has a %RSD > 15%, estimate positive results (J) and use professional judgment to qualify nondetects.

If any compound has a %RSD > 90%, estimate positive results (J) and reject nondetects (R).

If any compound has a % D > 20%, estimate positive results (J) and reject nondetects (R).

If any compound has a % D > 20%, estimate positive results (J) and nondetects (UJ).

If any compound has a % D > 90%, estimate positive results (J) and reject nondetects (R).

If any compound has r < 0.995, estimate positive results and nondetects.

A separate worksheet should be filled for each initial curve

All criteria were met _X
Criteria were not met
and/or see below

V A. BLANK ANALYSIS RESULTS (Sections 1 & 2)

The assessment of the blank analysis results is to determine the existence and magnitude of contamination problems. The criteria for evaluation of blanks apply only to blanks associated with the samples, including trip, equipment, and laboratory blanks. If problems with any blanks exist, all data associated with the case must be carefully evaluated to determine whether or not there is an inherent variability in the data for the case, or if the problem is an isolated occurrence not affecting other data.

List the contamination in the blanks below. High and low levels blanks must be treated separately.

Laboratory blanks

DATE ANALYZED	LAB ID	LEVEL! MATRIX	COMPOUND	CONCENTRATION UNITS
All_metho			ic_criteria	
ield/Equipmen				
DATE ANALYZED	LAB ID	LEVEL/ MATRIX	COMPOUND	CONCENTRATION UNITS

All criteria were met _	Х_	_
Criteria were not met		
and/or see below		

VB. BLANK ANALYSIS RESULTS (Section 3)

Blank Actions

Action Levels (ALs) should be based upon the highest concentration of contaminant determined in any blank. Do not qualify any blank with another blank. The ALs for samples which have been diluted should be corrected for the sample dilution factor and/or % moisture, where applicable. No positive sample results should be reported unless the concentration of the compound in the samples exceeds the ALs:

ALs = 10x the amount of common contaminants (methylene chloride, acetone, 2-butanone, and toluene)
ALs = 5x for any other compounds

Specific actions are as follows:

If the concentration is < sample quantitation limit (SQL) and \le AL, report the compound as not detected (U) at the SQL.

If the concentration is \geq SQL but \leq AL, report the compound as not detected (U) at the reported concentration.

If the concentration is \geq SQL and > AL, report the concentration unqualified.

Notes:

High and low level blanks must be treated separately

Compounds qualified "U" for blank contamination are still considered "hits" when qualifying for calibration criteria.

CONTAMINATION SOURCE/LEVEL	COMPOUND	CONC/UNITS	AL/UNITS	SQL	AFFECTED SAMPLES
		ı			
					<u> </u>
				<u> </u>	
			<u> </u>		,
•	! 				

All criteria were met _	_X_	_
Criteria were not met		
and/or see below		

SURROGATE SPIKE RECOVERIES

Laboratory performance of individual samples is established by evaluation of surrogate spike recoveries. All samples are spiked with surrogate compounds prior to sample analysis. The accuracy of the analysis is measured by the surrogate percent recovery. Since the effects of the sample matrix are frequently outside the control of the laboratory and may present relatively unique problems, the validation of data is frequently subjective and demands analytical experience and professional judgment.

List the percent recoveries (%Rs) which do not meet the criteria for surrogate recovery. Matrix: solid/aqueous

SAMPLE ID		SURROGATE COMPOUND			ACTION	
	Hexanol	DBFM	TOL-d8	BFB		
All surro	gate_recoveries_within_la	horatory contr	ol limits			
			01_1111103			
					"	
QC Limits*	(Aqueous)					
LL_	_to_UL73_to_123	to	to	to		
QC Limits*	(Solid-Low)					
LL_	_to_UL69_to_121	to	to	to_		
	(Solid-Med) _to_UL toto	4	.	4		
	_toto	10	to	to		
1,2-DCA =	1,2-Dichloromethane-d4		TOL-d8 =	Toluene-d8		
DBFM = Di	bromofluoromethane		BFB = Bro	mofluorobe	nzene	
* QC	C limits are laboratory in-h	ouse performa	nce criteria, LL =	lower limit.	UL = upper limit.	
* If (QC limits are not available	, use limits of 8	30 - 120 % for aq	ueous and	70 – 130 % for	solid
samples.			•	•		
Actions:						
700						
	QUALITY	%R < 10%	%R = 10	0% - LL	%R > UL	
	Positive results	J	J		J	
	Nondetects results	R	1111		Accent	

Surrogate action should be applied:

If one or more surrogate in the VOC fraction is out of specification, but has a recovery of > 10%. If any one surrogate in a fraction shows < 10 % recovery.

All criteria were met	_X	
Criteria were not met		
and/or see below		

VII. A MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD)

This data is generated to determine long term precision and accuracy in the analytical method for various matrices. This data alone cannot be used to evaluate the precision and accuracy of individual samples. If any % R in the MS or MSD falls outside the designated range, the reviewer should determine if there are matrix effects, i.e. LCS data are within the QC limits but MS/MSD data are outside QC limit.

1. MS/MSD Recoveries and Precision Criteria

The laboratory should use one MS and a duplicate analysis of an unspiked field sample if target analytes are expected in the sample. If target analytes are not expected, MS/MSD should be analyzed.

List the %Rs, RPD of the compounds which do not meet the criteria.

Sample ID:JC18649-1TMS/-1TMSD			Matrix/Level:Aqueous			
MS OR MSD	COMPOUND	%R		QC LIMITS	ACTION	
	ecovenes_and_RFD_	wiuiii_iau	oratory_	CONTROL HIMIS_EX	cept_for_the_followings	
						-77

- * QC limits are laboratory in-house performance criteria, LL = lower limit, UL = upper limit.
- * If QC limits are not available, use limits of 70 130 %.

Actions:

QUALITY	%R < LL	%R > UL
Positive results	J	J
Nondetects results	R	Accept

MS/MSD criteria apply only to the unspiked sample, its dilutions, and the associated MS/MSD samples:

If the % R for the affected compounds were < LL (or 70 %), qualify positive results (J) and nondetects (UJ).

If the % R for the affected compounds were > UL (or 130 %), only qualify positive results (J). If 25 % or more of all MS/MSD %R were < LL (or 70 %) or if two or more MS/MSD %Rs were < 10%, qualify all positive results (J) and reject nondetects (R).

A separate worksheet should be used for each MS/MSD pair.

All criteria were met _	X_
Criteria were not met	
and/or see below	

VII. B MATRIX SPIKE/MATRIX SPIKE DUPLICATE

MS/MSD - Unspiked Compounds

It should be noted that Region 2 SOP HW-24 does not specify a MS/MSD criteria for the unspiked compounds in the sample. A %RSD of < 50% has therefore been utilized as professional judgment.

If all target analytes were spiked in the MS/MSD, this review element is not applicable.

List the %RSD of the compounds which do not meet the criteria.

Sample ID:			Matrix/Le	evel/Unit:		
COMPOUND	SAMPLE CONC.	MS CONC.	MSD CONC.	% RSD	ACTION	
						ţ.
	1/2 =					

Actions:

^{*} If the % RSD > 50, qualify the positive result in the unspiked samples as estimated (J).

^{*} If the % RSD is not calculated (NC) due to nondetected value, use professional judgment to qualify the data.

All criteria were met _X
Criteria were not met
and/or see below

VIII. LABORATORY CONTROL SAMPLE (LCS) ANALYSIS

This data is generated to determine accuracy of the analytical method for various matrices.

1. LCS Recoveries Criteria

Where LCS spiked with the same analyte at the same concentrations as the MS/MSD? Yes or No. If no make note in data review memo.

List the %R of compounds which do not meet the criteria

	LCS ID	COMPOUND	% R	QC LIMIT
Recover	ies_within_labor	ratory_control_limits		
			20.10.	
		0 10 10		

- * QC limits are laboratory in-house performance criteria, LL = lower limit, UL = upper limit.
- * If QC limits are not available, use limits of 70 130 %.

Actions:

QUALITY	%R < LL	%R > UL
Positive results	J	J
Nondetects results	R	Accept

All analytes in the associated sample results are qualified for the following criteria.

If 25 % of the LCS recoveries were < LL (or 70 %), qualify all positive results (j) and reject nondetects (R).

If two or more LCS were below 10 %, qualify all positive results as (J) and reject nondetects (R).

2. Frequency Criteria:

Where LCS analyzed at the required frequency and for each matrix? <u>Yes</u> or No. If no, the data may be affected. Use professional judgment to determine the severity of the effect and qualify data accordingly. Discuss any actions below and list the samples affected.

		All criteria were metN/A Criteria were not met and/or see below
IX.	FIELD/LABORATORY DUPLICATE PRECISION	
	Sample IDs:	Matrix:

Field/laboratory duplicates samples may be taken and analyzed as an indication of overall precision. These analyses measure both field and lab precision; therefore, the results may have more variability than laboratory duplicates which only laboratory performance. It is also expected that soil duplicate results will have a greater variance than water matrices due to difficulties associated with collecting identical field duplicate samples.

The project QAPP should be reviewed for project-specific information.

Suggested criteria: RPD \pm 30% for aqueous samples, RPD \pm 50 % for solid samples. If both samples and duplicate are <5 SQL, the RPD criteria is doubled.

COMPOUND	SQL	SAMPLE CONC.	DUPLICATE CONC.	RPD	ACTION
			this data package. MS/loratory and generally ac		recoveries RPD used to econtrol limits.
					-
l					

Actions:

Qualify as estimated positive results (J) and nondetects (UJ) for the compound that exceeded the above criteria. For organics, only the sample and duplicate will be qualified.

If an RPD cannot be calculated because one or both of the sample results is not detected, the following actions apply:

If one sample result is not detected and the other is greater than 5x the SQL qualify (J/UJ).

If one sample value is not detected and the other is greater than 5x the SQL and the SQLs for the sample and duplicate are significantly different, use professional judgment to determine if qualification is appropriate.

If one sample value is not detected and the other is less than 5x, use professional judgment to determine if qualification is appropriate.

If both sample and duplicate results are not detected, no action is needed.

All criteria were met_	_N/A	
Criteria were not met		
and/or see below		

X. INTERNAL STANDARD PERFORMANCE

The assessment of the internal standard (IS) parameter is used to assist the data reviewer in determining the condition of the analytical instrumentation.

List the internal standard area of samples which do not meet the criteria.

- * Area of +100% or -50% of the IS area in the associated calibration standard.
- * Retention time (RT) within 30 seconds of the IS area in the associated calibration standard.

DATE	SAMPLE ID	IS OUT	IS AREA	ACCEPTABLE RANGE	ACTION	
3690					<u> </u>	
			·-	· · · · · · · · · · · · · · · · · · ·		
Actions:						

1. IS actions should be applied to the compound quantitated with the out-of-control ISs

QUALITY	IS AREA < -25%	IS AREA = -25 % TO - 50%	IS AREA > + 100%
Positive results	J	J	J
Nondetected results	R	UJ	ACCEPT

2. If a IS retention time varies more than 30 seconds, the chromatographic profile for that sample must be examined to determine if any false positive or negative exists. For shifts of a large magnitude, the reviewer may consider partial or total rejection of the data for the sample fraction.

All criteria were mel _	_X_	_
Criteria were not met		
and/or see below		

XII. SAMPLE QUANTITATION

The sample quantitation evaluation is to verify laboratory quantitation results. In the space below, please show a minimum of one sample calculation:

JC18649-1TMS

Methanol

RF = 15.46

[] = (82826)/(15.46)

= 5,357 ppm OK

All criteria were met _	Χ_	_
Criteria were not met		
and/or see below		

XII. QUANTITATION LIMITS

A. Dilution performed

SAMPLE ID	DILUTION FACTOR	REASON FOR DILUTION

Percent Solids
List samples which have ≤ 50 % solids

Actions:

If the % solids of a soil sample is 10-50%, estimate positive results (J) and nondetects (UJ)

If the % solids of a soil sample is < 10%, estimate positive results (J) and reject nondetects (R)